

Before the
Federal Communications Commission
Washington, D.C.

In the Matter of)	RM-10868
Petition For Rule Making)	
Amendment of Part 97 of FCC Amateur Service)	
Rules to Eliminate Morse Code Testing)	

Comments of James P. Miccolis, N2EY

Introduction

I am submitting these comments in response to RM-10868, the restructuring proposal submitted by the RAF, to oppose parts of the proposal and to support other parts.

I am an electrical engineer with BSEE and MSEE degrees from the University of Pennsylvania and Drexel University, respectively, and am employed full time in the design of control systems for the transportation industry. I am coinventor of US Patent 5,358,202. I am also an amateur radio operator, first licensed by the Commission in 1967, and currently hold an Amateur Extra class license. My interest in amateur radio at an early age led me to pursue a career in electrical engineering.

I have separated the RAF proposal into “Good Ideas” which I support and “Bad Ideas” which I oppose.

Good Ideas

Entry Level License Class – The revised entry-level license class is, in principle, a good idea proposed by RM-10868. By offering an easy entry into the Amateur Radio Service and a balanced set of privileges, it is better suited to the purpose than the current Technician class. However, the proposed privileges are much too limited, and should be expanded to those proposed by the ARRL in RM-10867. I would also include the 5 wpm Morse Code test as part of the requirements.

Retention of Morse Code Test – RM-10868 proposes to keep the current Morse Code test requirements for General and Amateur Extra. I fully support this part of the proposal.

Bad Ideas

Free Upgrades – RM-10868 proposes that all existing Novice licenses receive a free upgrade to Technician, and that all Advanced licenses receive a free upgrade to Amateur Extra. This is based solely on the idea that it is necessary to eliminate license classes that are currently closed to new applicants. Yet the Commission has maintained such license

classes for the past four years with no apparent difficulty. All that is required to maintain these classes is one field in the license database and a few operating privilege regulations. Similar free upgrades were proposed by ARRL in 1998, and the Commission was correct to decline them. The current upgrade requirements and test procedures are not so difficult as to impede anyone holding a “legacy” license class from upgrading.

Entry-Level License Privileges - RM-10868 proposes entry-level HF operating privileges that are too limited. Newcomers need more access to the most-popular bands, rather than being limited to small parts of bands that are of limited usefulness much of the time.

Conclusion

RM-10868’s proposed revamping of the entry-level license is basically a good idea, but should be enacted with privileges like those in RM-10867. The proposed free upgrades should not be enacted.

Respectfully submitted,

James P. Miccolis